

# EXHIBIT A

# Timeline

<b>1988</b>	<b>Oct:</b>	Boneau invents Boneau stent.
<b>1989</b>	<b>May:</b>	Boneau meets with ACS and discloses Boneau stent to ACS.
	<b>Aug 24:</b>	Boneau patent application filed with PTO.
	<b>Aug:</b>	Boneau gives the Boneau patent application to ACS.
	<b>Sep:</b>	ACS tells Boneau it has no interest in Boneau stent.
<b>1990</b>	<b>Jan:</b>	ACS's in-house patent counsel, Barclay, requests ACS's outside patent counsel, Lynch, to provide report on Boneau.
	<b>Jan:</b>	Lynch reviews Boneau patent application and provides written report to Barclay.
	<b>Mar:</b>	Lynch gets a <b>second</b> copy of Boneau patent application, reviews it and discusses it with the head of ACS's stent business unit, McDermott.
	<b>Jul:</b>	Lau issues report to ACS's management on Boneau stent and other stents.
	<b>Jul:</b>	ACS contacts Boneau and expresses renewed interest in Boneau stent.
	<b>Aug/Sep:</b>	Boneau and Stertzler make extensive disclosures to ACS reps, including Lau and Orth.
	<b>Sep:</b>	ACS communicates with Lynch about filing Lau patent applications.
	<b>Sep:</b>	For <b>second</b> time, ACS advises Boneau it has no interest in Boneau stent.
<b>1991</b>	<b>Oct:</b>	Lynch files first Lau application. <b>No disclosure of Boneau.</b>
<b>1992</b>	<b>Aug:</b>	Disclosure of 80+ references to PTO in connection with Lau application. <b>No disclosure of Boneau.</b>
<b>1995</b>	<b>Jun:</b>	Lau '955 Patent issues. <b>No disclosure of Boneau.</b>
<b>1996</b>	<b>May:</b>	Lau '154 Patent issues. <b>No disclosure of Boneau.</b>
<b>1997</b>	<b>Feb:</b>	Lau '516 Patent issues. <b>No disclosure of Boneau.</b>
	<b>Aug:</b>	1st disclosures of Boneau. ACS twice confirms that Boneau is "relevant."

# EXHIBIT B

## Lau Inequitable Conduct Timeline (1988 - 1989)

In October of 1988, Michael Boneau invents the Boneau stent. (D.I. 636, Tr. 1210:21-1212:6; AX-18)

**May 1988**

Boneau begins discussing the Boneau stent with the Vice-President and the Director of ACS's R&D. (D.I. 670, Tr. at 113:13-115:13)

**Jul 1988**

ACS hires Lilip Lau as a stent engineer and Elizabeth McDermott is his supervisor. (D.I. 670, Tr. at 263:22-264:23; D.I. 671, Tr. at 424:12-13)

**Aug 1988**

Boneau provides ACS's Director of R&D, Dr. Gary Schneiderman, with a copy of his Boneau patent application. The two also discuss the clinical work done by Dr. Simon Sletzer using the Boneau stent. (D.I. 670, Tr. at 115:17-116:24)

**Aug 24, 1989**

Boneau files his U.S. Patent Application No. 07/398,180. (D.I. 670, Tr. at 115:17-116:2)

**Sep 1988**

Dr. Schneiderman advises Boneau that ACS is not interested in pursuing the Boneau stent. (D.I. 670, Tr. at 116:25-117:12)

May 1, 1989

May 15, 1989

Jun 1, 1989

Jun 15, 1989

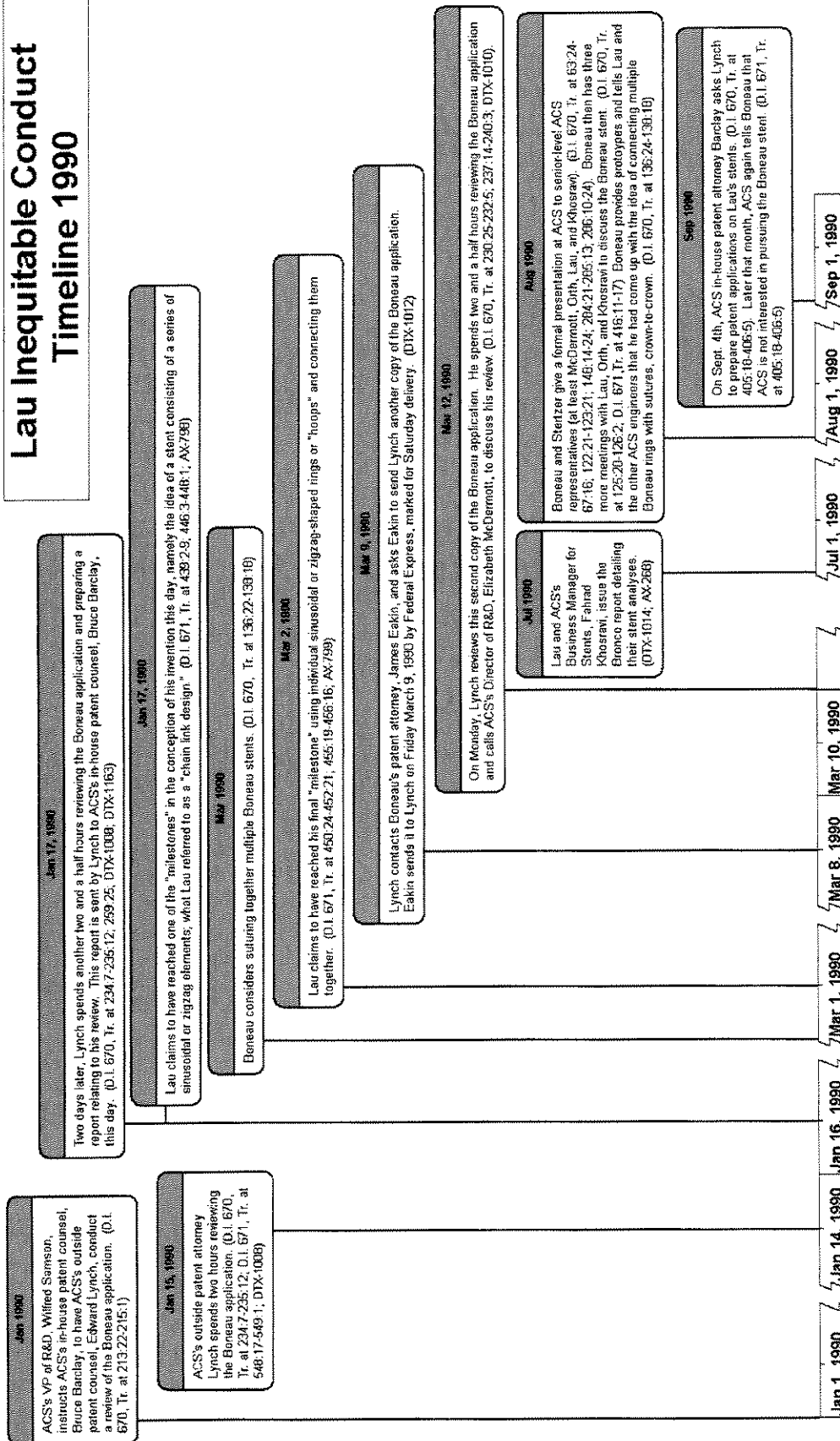
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Jul 15, 1989

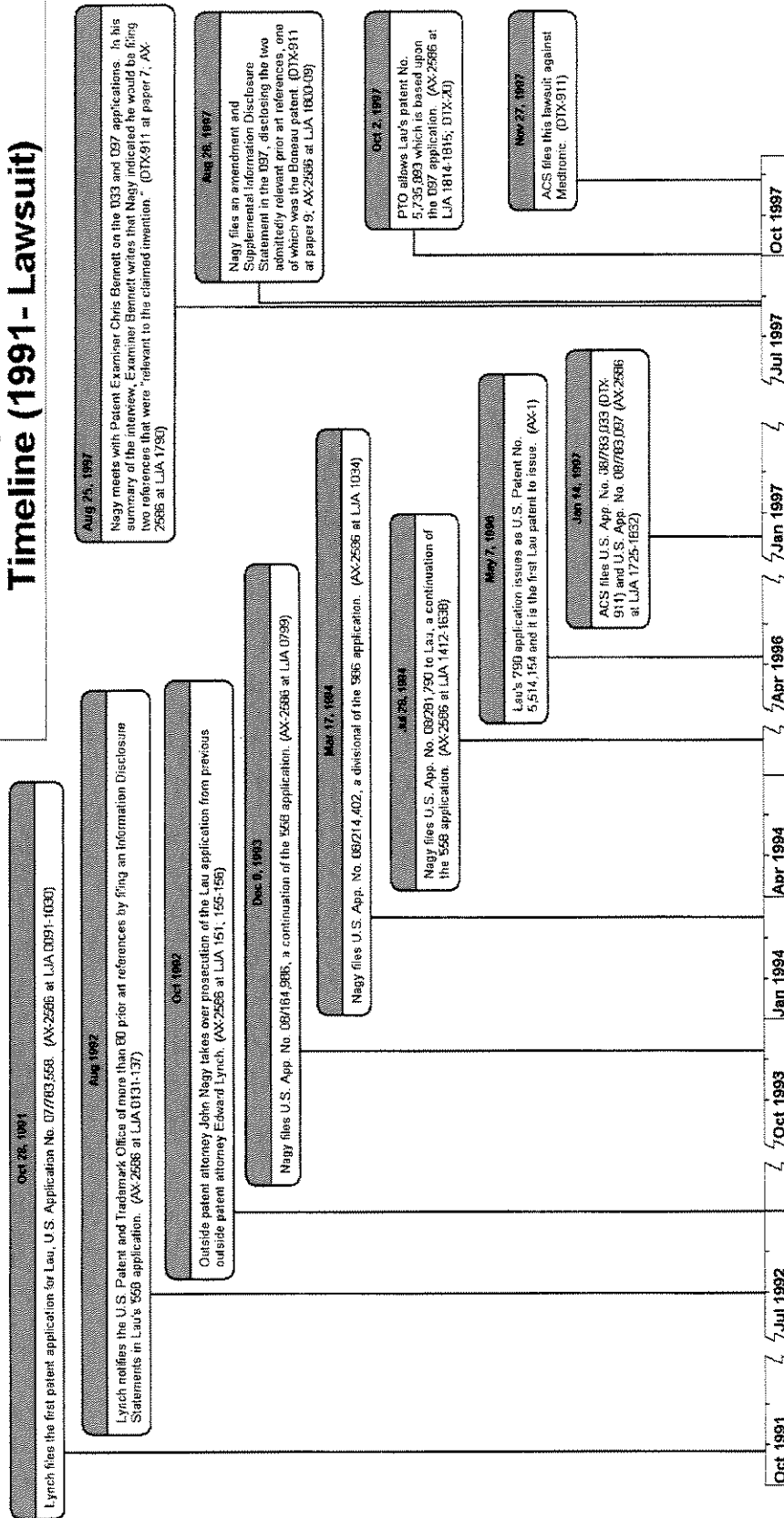
Aug 1, 1989

Aug 15, 1989

# Lau Inequitable Conduct Timeline 1990

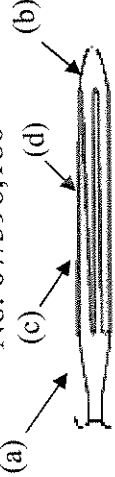

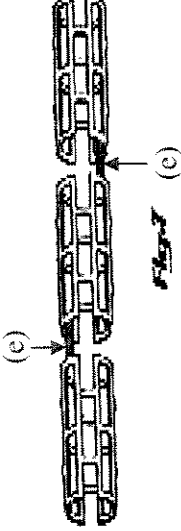
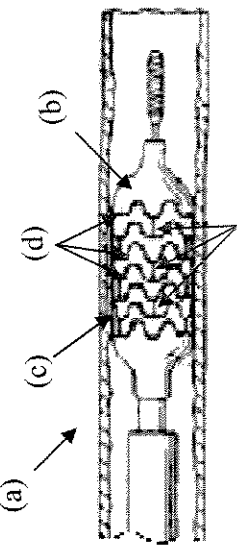


## Lau Inequitable Conduct Timeline (1991- Lawsuit)



# EXHIBIT C



Prior Art	Lau Patent Application No. 08/281,790 (Issued as U.S. 5,514,154)	Lau
<p data-bbox="337 1474 410 1868">Boneau Patent Application No. 07/398,180</p>  <p data-bbox="548 1602 581 1751">Figure 2</p> <p data-bbox="597 1389 914 1953">"[A] plurality of such stents may be positioned along a single balloon catheter for simultaneous delivery to the affected area." (p. 9, ll. 19-20.) "Typical cardiovascular vessels into which the stent 10 might be implanted range from 1.5 millimeters to five millimeters in diameter, and corresponding stents may range from one millimeter to two centimeters in length." (p. 7, ll. 28-31.)</p> <p data-bbox="938 1538 971 1804">Palmaz 5,102,417</p>  <p data-bbox="1125 1602 1157 1719">FIG. 7</p> <p data-bbox="1182 1538 1214 1793">Schatz 5,195,984</p>  <p data-bbox="1369 1602 1401 1708">FIG. 7</p>	<p data-bbox="345 963 378 1229"><u>Claim 23 (cancelled)</u></p> <p data-bbox="410 857 597 1357">(a) A kit of parts, comprising: (b) an elongated stent delivery catheter having a proximal end and a distal end, and an expandable member on the distal end; and (c) a longitudinally flexible stent which is adapted to be slidably mounted onto the expandable member of said catheter and which comprises (d) a plurality of cylindrical elements which are independently expandable in the radial direction and which are interconnected so as to be concentrically aligned on a common longitudinal axis, wherein each said element is formed of a single elongated structural member forming a serpentine pattern having undulations with peaks and valleys, (e) said elements being interconnected by a plurality of generally parallel interconnecting members between adjacent elements, each said interconnecting member configured to interconnect only said cylindrical elements that are adjacent to each other.</p>	 <p data-bbox="654 474 703 591">FIG. 2</p> <p data-bbox="760 240 1044 804">Declaration (LJA-1449 - 1451) "We believe we are original, first and joint inventors of the subject matter which is claimed ... We acknowledge the duty to disclose information which is material to the examination of this application in accordance with Title 37, Code of Federal Regulations, Sec. 1.56(a)."</p> <p data-bbox="1076 240 1304 804">Full name of first inventor: <u>Lau, Jui-Lin</u> Inventor's signature: <u>[Signature]</u> Date: <u>July 23</u>, 1998. Residence: <u>Sunnyvale</u>, <u>California</u>, <u>USA</u> Citizenship: <u>United States of America</u> Post office address: <u>1111 South Sage Court</u>, <u>Sunnyvale</u>, <u>California</u>, <u>94087</u></p>